

Robert A. Julian (SBN 88469)  
Cecily A. Dumas (SBN 111449)  
BAKER & HOSTETLER LLP  
Transamerica Pyramid Center  
600 Montgomery Street, Suite 3100  
San Francisco, CA 94111-2806  
Telephone: 415.659.2600  
Facsimile: 415.659.2601  
Email: rjulian@bakerlaw.com  
Email: cdumas@bakerlaw.com

Eric E. Sagerman (SBN 155496)  
David J. Richardson (SBN 168592)  
Lauren T. Attard (SBN 320898)  
BAKER & HOSTETLER LLP  
11601 Wilshire Blvd., Suite 1400  
Los Angeles, CA 90025-0509  
Telephone: 310.820.8800  
Facsimile: 310.820.8859  
Email: esagerman@bakerlaw.com  
Email: drichardson@bakerlaw.com  
Email: lattard@bakerlaw.com

*Counsel for Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Elizabeth A. Green (*pro hac vice*)  
BAKER & HOSTETLER LLP  
200 South Orange Avenue, Suite 2300  
Orlando, FL 32801  
Telephone: 407.649.4036  
Facsimile: 407.841.0168  
Email: egreen@bakerlaw.com

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF LAUREN T.  
ATTARD IN SUPPORT OF THE REPLY  
BRIEF OF THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
TO CERTAIN OBJECTIONS TO  
CONFIRMATION OF DEBTORS' AND  
SHAREHOLDER PROPONENTS'  
JOINT CHAPTER 11 PLAN OF  
REORGANIZATION DATED  
MARCH 16, 2020**

Date: May 27, 2020  
Time: 10:00 a.m. (Pacific Time)  
Place: **Telephonic Appearances Only**  
United States Bankruptcy Court  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102

1 I, Lauren T. Attard, under penalty of perjury, declare as follows:

2 1. I am an attorney with the law firm of Baker & Hostetler LLP, attorneys of record  
3 for The Official Committee of Tort Claimants (the “**TCC**”) appointed in the above-captioned  
4 chapter 11 cases (the “**Cases**”) of PG&E Corporation and Pacific Gas and Electric Company (the  
5 “**Debtors**”). I am a member in good standing of the bar of California. I have personal knowledge  
6 of the facts stated herein and I could and would competently and truthfully testify to those facts if  
7 called as witness.

8 2. I am authorized to execute this declaration on behalf of the TCC. Unless otherwise  
9 stated in this declaration, I have personal knowledge of the facts set forth herein. Documents that  
10 are attached to this Declaration were obtained by me in the course of my duties described above.

11 3. I submit this Declaration in support of the Reply Brief of the Official Committee of  
12 Tort Claimants to Certain Objections to Confirmation of Debtors’ and Shareholder Proponents’  
13 Joint Chapter 11 Plan of Reorganization Dated March 16, 2020 (the “**Confirmation Reply**”).

14 4. In the course of my duties as one of the attorneys for the TCC, I was tasked with  
15 collecting signatures of TCC’s members’ counsel who were signing as “Consenting Professionals”  
16 on the First Amendment to Restructuring Support Agreement (the “**RSA Amendment**”) dated  
17 December 16, 2019. Attached hereto as Exhibit A is a true and correct copy of a signature page to  
18 the RSA Amendment that was forwarded to me by Francis Scarpulla, counsel to GER Hospitality.  
19 GER Hospitality was a member of the TCC at that time. The purpose of this document was for  
20 counsel who wished to be considered “Consenting Professionals” to also provide their signature,  
21 because the TCC’s counsel, Baker Hostetler, was signing on behalf of the TCC as a result of a  
22 unanimous vote of approval by the TCC. This document was sent to me by facsimile, and shows  
23 on its face that it was sent from Mr. Scarpulla’s home fax machine. It is my understanding that the  
24 signature on this document is Mr. Scarpulla’s signature, and that he signed on behalf of his client,  
25 GER Hospitality. Because the signature page was not completed correctly, and was not received  
26 in time, we did not attach it to the filed version of the RSA Amendment.

27 ///

28 ///

1 *Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States*  
2 *of America that the foregoing is true and correct to the best of my knowledge and belief.*

3 Dated: Los Angeles, California  
4 May 22, 2020

/s/ Lauren T. Attard  
Lauren T. Attard